

September 30, 2022

VIA ECF

United States Magistrate Judge Sarah Cave
United States District Court for the
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: Wagner et al. v. International Business Machines Corp., 1:21-CV-09443-LTS-SLC

Dear Magistrate Judge Cave:

The parties jointly submit this joint status letter pursuant to Your Honor's September 12, 2022 Order (Dkt. No. 69). As the parties noted in their September 10, 2022 letter requesting an adjournment of the initial case management conference (Dkt. No. 68), the parties have reached a tentative resolution of this matter and continue to engage in discussions about the same.

On September 10, 2022, the parties simultaneously sought a full stay of proceedings in this matter from the Honorable Laura Taylor Swain (Dkt. No. 67). Judge Swain granted the parties' request and set a deadline of November 8, 2022 to file either a stipulation of dismissal or a status report (Dkt. No. 70). By November 8, the parties will file a stipulation of dismissal or will file a joint status report.

If this proposed timeline meets with Your Honor's approval, a "So Ordered" line is provided below for the Court's convenience.

Respectfully submitted,

/s/ Matthew W. Lampe
Matthew W. Lampe
Counsel for Defendant

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan
Counsel for Plaintiffs

By **Wednesday, November 9, 2022**, the parties shall file a stipulation of dismissal for review and endorsement by the Honorable Laura Taylor Swain, or alternatively, file a joint status letter regarding the status of resolution.

SO ORDERED 10/03/22


SARAH L. CAVE
United States Magistrate Judge